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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of Billed Party Preference for 0+ InterLATA Calls	)	CC Docket No. 92-77 Phase I

REPLY COMMENTS OF ONE CALL COMMUNICATIONS, INC., d/b/a OPTICOM

Randall B. Lowe
Charles H.N. Kallenbach
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, D.C. 20005
(202) 879-3939

Attorneys for One Call Communications, Inc., d/b/a/ OPTICOM

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REPLY COMMENTS

One Call Communications, Inc., d/b/a OPTICOM ("Opticom"), by its attorneys and pursuant to the Commission's request in the above-referenced docket,[1/] hereby submits Reply Comments concerning methods for compensating operator service providers ("OSPs") for transferring 0+ dialed proprietary card calls to card issuers for completion.

I. INTRODUCTION AND SUMMARY

In its Request, the Commission seeks comment "on methods for compensating operator service providers who continue to receive 0+ dialed proprietary calling card calls and who wish to transfer those calls to the card issuer for completion."[2/] In its initial Comments, Opticom demonstrated that OSPs must be reimbursed for their efforts to route these

1/ Report and Order and Request for Supplemental Comment, FCC 92-465 (released: Nov. 6, 1992) ("Request").

2/ Request at ¶ 64.

calls to the card issuer.[3/] Opticom also set forth three usual methods by which OSPs transfer proprietary card calls: (1) advising the user to hang up and dial the card issuer's access number; (2) "splashing back" or rerouting the call to the originating local exchange carrier ("LEC"), which would then connect the call to the card issuer's nearest point of presence; or (3) transferring the call directly to the card issuer's network. Although Opticom pointed out that the third method was most convenient and efficient,[4/] Opticom stated its position that OSPs should be compensated for providing 0+ transfer service under any of the three methods.[5/]

In its comments, Opticom proposed a definition of 0+ transfer service based on the Commission's definition of access service, such that, similar to access and 0- transfer charges, 0+ charges apply when the proprietary card issuer receives the call. Opticom also stated its belief that OSPs should recover all cost elements related to transfer services.[6/] Opticom

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3/ See Opticom Comments at 3-6.

4/ Id. at 2-3.

5/ Id. at 3 n. 8. Capital Network System, Inc. ("CNS") argues that OSPs should be compensated even when the caller hangs up after the first "bong" tone. CNS Supplemental Comments at 5-6. While Opticom agrees that such calls force OSPs to incur access charges and other costs, there is no way to determine whether the caller is (or was) a proprietary card holder or that the caller tried to reach the issuer's network after the "bong." Opticom, therefore, does not propose that OSPs be reimbursed for costs associated with such calls.

6/ Opticom Comments at 6-7.

proposed that the transferring carrier should provide transfer service pursuant to either carrier-to-carrier contracts or tariff, and, in the event that a card issuer does not enter into such a contract or does not subscribe to such a tariff, the Commission should then establish through routes and through rates for 0+ calls that are transferred to that card issuer.[7/]

The overwhelming majority of commenters agree with Opticom's position that the Commission must develop a transfer compensation mechanism. Only AT&T and Sprint question the need to compensate OSPs for the valuable services they are providing to proprietary card issuers. Yet their positions conflict with the Commission's stated goal of enhancing customer convenience by reducing excessive dialing by calling parties.[8/]

In short, and as set forth more fully below, the arguments for compensation are compelling, and the mechanisms for arranging compensation are technically feasible and would not be difficult to implement. The Commission should, consequently, adopt Opticom's comments and institute promptly Opticom's suggested methods for obtaining compensation for 0+ transfer services.

7/ Id. at 4-6, 8-10.

8/ Id. at 3 n. 6 (*citing* Request at ¶ 56).

II. **DISCUSSION**

A. OSPs ARE ENTITLED TO COMPENSATION FOR PROVIDING 0+ TRANSFER SERVICE TO PROPRIETARY CARD ISSUERS

Out of the 20 parties commenting on the issue of compensation, 18 actively support the development of a compensation mechanism for 0+ transfer service.[9/] As CompTel explains, OSPs that receive misdialed proprietary card calls lose significant billable 0+ traffic and incur substantial direct and indirect costs.[10/]

Based on a survey of its OSP membership, CompTel estimates that approximately 11% of 0+ call attempts to carriers other

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9/ See Comments of American Public Communications Council at 2; Supplemental Comments of Amnet, Inc. at 1-2; Supplemental Comments of CNS at 5-8; Supplemental Comments of Cleartel Communications, Inc., International Pacific, Inc., and Teltrust Communications Services, Inc. at 5-7; Supplemental Comments of The Competitive Telecommunications Association ("CompTel") at 4-14; Comments of Intellicall, Inc. at 6; Supplemental Comments of International Telecharge, Inc. ("ITI") at 4-6; Supplemental Comments of LDDS Communications, Inc. at 3-6; Comments of LinkUSA at 6; Comments of MCI Telecommunications Corporation ("MCI") at 2-3; Comments of National Tele-Sav, Inc. ("NTSI") at 2-3; Supplemental Comments of Phonetel Technologies, Inc. at 3-4; Comments of Rock Hill Telephone Company at 2; Comments of Long Distance, Inc. at 8-10; Value-Added Communications Inc. at 2. Several LECs take no position on this issue. Comments of Pacific Bell and Nevada Bell at 1; Comments of Southwestern Bell Telephone Company at 2.

10/ See CompTel Supplemental Comments at 4-6 (citing Request ¶ 25 (where the Commission recognizes that AT&T's deployment of its CIID card has created "an immediate competitive problem ... [which] cannot be eliminated unilaterally by AT&T's competitors")).

than AT&T are placed by AT&T card holders.[11/] CompTel points out that the costs associated with handling CIID card calls are "extraordinary" and "largely unavoidable," but caused by only one company, AT&T.[12/] CNS is more blunt:[13/]

> Thus, AT&T is taking advantage of the current regulatory environment to implement an anti-competitive business strategy of increasing substantially its competitors' costs by forcing them to provide informational and call transfer services without compensation. CNS believes that the Commission must require AT&T immediately to compensate OSPs for their costs in providing these services.

In response, AT&T languidly asserts that its educational campaign, mandated by the Commission, will reduce the number of proprietary card calls received by OSPs,[14/] obviating the need for compensation,[15/] and that the technical mechanisms to

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11/ Id. at 8. Up to 23% of call attempts reported by OSPs that principally serve the hotel/motel industry were placed by proprietary card holders. NTSI, which serves the hotel/motel industry category, confirms that about 20% of its calls are from CIID card holders. NTSI Comments at 2.

12/ CompTel Supplemental Comments at 9.

13/ CNS Supplemental Comments at 3.

14/ Sprint also states that mandatory compensation is not required because the number of misdialed calls will be reduced by AT&T's educational campaign. However, Sprint does not oppose voluntary call transfer and compensation therefor. See Sprint Supplemental Comments at 3-7.

15/ AT&T also speculates that its customers may disregard its educational campaign if they can dial 0+ and be transferred. AT&T Supplemental Comments at 6.

institute 0+ transfer are inadequate.16/ With regard to the transfer mechanism preferred by Opticom (call transfer with Automatic Number Identification ("ANI")), AT&T questions the quality of the OSP facilities (which must remain engaged during the call), raises concerns about capital costs and asserts that its operator centers will not be able to receive or process the ANI.17/

AT&T's comments ignore the fact that OSPs incur, and will continue to incur, substantial costs associated with transferring CIID calls to AT&T's network. It is entirely speculative, and highly dubious, that 100% of AT&T's customers will, some day in the future, dial 10288 for every CIID call.18/ Indeed, given the large number of CIID cardholders,19/ it is unlikely that AT&T will be completely successful in training its customers to avoid dialing 0+. Even if AT&T is 95% successful in educating its customers, and only 5% of AT&T's customers continue dialing

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16/ Id. at 2-3 ("None of these mechanisms appears to offer a technically simple and cost-effective solution that is convenient for customers and will work universally").

17/ Id. at 4-5. Specifically, AT&T states that "such transfers do not necessarily assure that the receiving carrier will get the Automatic Number Identification ("ANI") for the originating telephone or other identification digits necessary to provide adequate screening functions." Id. at 5 (footnote omitted).

18/ Even Sprint concedes that "some AT&T customers will undoubtedly continue to dial 0+ on all calls...." Sprint Supplemental Comments at 4.

19/ As CompTel points out, there are more than 25 million CIID cards in circulation. CompTel Supplemental Comments at 4.

0+ on a regular basis, OSPs may still incur costs of nearly $100 million annually.[20/]

AT&T's position is especially galling in light of the fact that this issue was raised over four years ago.[21/] Thus, the Commission and AT&T have been on notice for several years that OSPs have been unfairly required to incur substantial expense for 0+ transfer.[22/] It was entirely foreseeable that the amount of unreimbursed costs would skyrocket after the introduction of CIID cards in 1991. During the intervening period, OSPs have incurred millions of dollars in unreimbursed costs by transferring AT&T's customers to AT&T's network. The Commission should not permit AT&T to avoid responsibility for covering these costs based on a claim that they will go away some time in the future.

Moreover, AT&T's technical objections to the transfer mechanisms proposed by OSPs are baseless. In particular, AT&T sets forth no technical reason why its operator service centers cannot accept call transfers with ANI. It appears that the

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20/ CNS estimates that it costs about $1.50 to handle each misdialed call. CNS Supplemental Comments at 7 n. 14. Assuming each "uneducated" cardholder makes one misdialed proprietary card call per week, the total annual costs incurred by the OSP industry would be ($1.50 x 52 x .05 x 25,000,000) or $97,500,000.

21/ In the Matter of National Telephone Services Petition for Declaratory Ruling that AT&T Should Establish a Through Rate and a Reasonable Division of Charges, File No. ENF-89-2 ("NTS Proceeding").

22/ Request at ¶¶ 25 & 55 (recognizing that processing costs are incurred that are unrecoverable).

software in an AT&T switch does not recognize telephone numbers not served by that switch.[23/] If this is the case, AT&T need only revise the software because it has admitted that its switches can accept and process ANIs. If not, AT&T should explain with specificity why its "advanced" network is unable to handle the simple function of recognizing an ANI.

B. COMMENTERS AGREE THAT OSPs SHOULD BE PERMITTED TO PROVIDE TRANSFER SERVICES PURSUANT TO EITHER CONTRACT OR TARIFF

In its Comments, Opticom stated its willingness to negotiate carrier-to-carrier contracts with proprietary card issuers[24/] or to file tariffs for 0+ transfer services.[25/] A majority of the parties addressing this issue agree.[26/]

23/ AT&T Supplemental Comments at 5 n. 6.

24/ Opticom Comments at 4 (citing at 5 Bell Tel. Co. of Pennsylvania v. FCC, 503 F.2d 1250, 1276 (3d Cir. 1974) (carrier-to-carrier contracts "represent a legitimate method of ordering business relations under Congress' regulatory legislation.").

25/ Id. at 5 (citing as precedent In the Matter of Investigation of Access and Divestiture Related Tariffs, 97 FCC 2d 1082 (1984); In the Matter of Contel Telephone Co. Petition for Waiver of Section 69.4(b) of the Commission's Rules, 6 FCC Rcd 1590 (CCB 1991); In the Matter of Illinois Cons. Tel. Co. Petition for Waiver of Part 69 Regarding Operator Transfer, 5 FCC Rcd 3246 (CCB 1990); In the Matter of NYNEX Petition for Waiver, 63 R.R.2d 1087 (CCB 1987); In the Matter of the Bell Atlantic Telephone Companies, 4 FCC Rcd 455 (CCB 1988)).

26/ E.g., CNS Supplemental Comments at 8-11; CompTel Supplemental Comments at 19; Intellicall Comments at 10; ITI Supplemental Comments at 7. MCI indicates a preference for carrier-to-carrier contracts. MCI Comments at 4.

LDDS and PhoneTel, on the other hand, argue that transfer services must be provided pursuant to tariff under Section 203(a) of the Communications Act.[27/] Although both parties recognize that carrier-to-carrier contracts are permissible under the Act, they are apparently concerned that proprietary card issuers will refuse to negotiate contracts in good faith.[28/]

As Opticom stated in its Comments, the Commission should establish through rates under Section 201(a) of the Act if proprietary card issuers refuse to subscribe to 0+ transfer tariffs or to enter into contracts.[29/] Many commenters propose that the Commission order card issuers to enter into such arrangements.[30/] Either action would moot the concerns of LDDS and PhoneTel.[31/]

27/ LDDS Supplemental Comments at 7-8 (citing AT&T v. FCC, 978 F.2d 727 (D.C. Cir. 1992)); PhoneTel Supplemental Comments at 6-9. (However, on December 28, 1992, the Commission filed a petition for rehearing in the AT&T case which stays the effectiveness of the Court's decision. *See* F.R.A.P. 41(a)).

28/ *Id*.

29/ *See* Opticom Comments at 8. *See also infra* at 11-12.

30/ *E.g.*, CNS Comments at 8-11; CompTel Supplemental Comments at 19; Intellicall Comments at 10; ITI Supplemental Comments at 7.

31/ Requiring tariff filings alone does not cure the concerns of LDDS and PhoneTel because taking the service would still be discretionary with the interexchange carrier ("IXC").

In its Comments, Opticom proposed that 0+ transfer service provided by OSPs could be defined in a manner similar to the definition of access service: "services and facilities provided for the origination or termination of any interstate or foreign telecommunication using a proprietary calling card."[32/] This definition is broad enough to cover the three methods of transferring proprietary calls described above.[33/]

Intellicall argues, however, that the definition of transfer service should not include orally advising the caller how to access the card issuer's network by dialing 10XXX.[34/] Yet this is clearly a transfer service and, moreover, it furthers the Commission's goal of educating proprietary card holders of how to access issuers' facilities. Intellicall's assertion also conflicts with its own suggestion that the definition should "emphasize[] the nature of the service rather than the technical means of provisioning it."[35/]

32/ *See* Opticom Comments at 6 (*citing* 47 C.F.R. § 69.2(b)). Opticom suggested an alternative definition based upon the definition contained in the Operator Transfer Service tariffs for 0- calls. *See also* Intellicall Comments at 7.

33/ *See supra* at 2.

34/ Intellicall Comments at 8.

35/ *Id*.

C. IN THE ALTERNATIVE, THE RECORD DEMONSTRATES THAT THE COMMISSION SHOULD ORDER CARD ISSUERS TO ESTABLISH THROUGH ROUTES AND THROUGH RATES

In its Comments, Opticom argued that the Commission should establish through routes and through rates for OSPs needing to access card issuers that refuse to subscribe to tariffs or to negotiate contracts in good faith.[36/] The record demonstrates that OSPs incur substantial expense in serving proprietary card customers. Presumably, the Commission and card issuers desire OSPs to continue to do so. Through routes and through rates would provide a suitable reimbursement mechanism and are also in the public interest because they would be efficient and convenient to the card user.[37/]

AT&T argues that the proposed transfer mechanisms are "inherently inconsistent" with the concept of a through route that "requires that two carriers hold themselves out to the public as participating in a joint endeavor."[38/] AT&T also seems to object to the fact that the transferring OSP would

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36/ Opticom Comments at 8-10 (citing 47 U.S.C. § 201(a) and cases thereunder).

37/ Id.

38/ AT&T Supplemental Comments at 5 n. 7 (citing AT&T Opposition in NTS Proceeding at 6 n.*** (citing Thompson v. United States, 343 U.S. 549, 558 (1952); Sea-Land Service, Inc. v. Federal Maritime Comm., 404 F.2d 824, 827 (D.C. Cir. 1968)). However, those decisions make clear that a joint holding-out is only one test for determining whether a through route exists; it is not a "requirement" if the Commission decides to order through routes.

have "sole discretion" to transfer calls.[39/] Aside from the fact that AT&T's construct of a joint endeavor is a red herring, if a joint route is ordered, AT&T and the OSPs will have to learn to work together.

III. CONCLUSION

The record demonstrates that the Commission should require proprietary card issuers to compensate OSPs for providing 0+ transfer services pursuant to contracts or tariffs. If card

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39/ Id. Sprint argues that establishing through routes would be administratively burdensome for the Commission. Sprint Supplemental Comments at 5-6. However, Sprint concedes that "few carriers today engage in call transfer...." Id. at 5. Moreover, the solution of through routes and rates as proposed by Opticom would only apply when and if an IXC did not enter into a contract or take service pursuant to a tariff. This approach should only involve a few carriers on an *ad hoc* basis. Thus, the Commission need expend minimal administrative resources to solve a substantial problem. Sprint argues further that mandatory compensation could provide OSPs with an incentive to encourage proprietary card customers to misdial 0+ rather than dial 10XXX. Id. at 4. No party has suggested that OSPs receive a profit from the transfer service. Further, OSPs lose the interexchange revenue for transferred calls. As a result, OSPs have no incentive to "promote" 0+ transfer.

issuers refuse to participate in this equitable solution, the Commission should then order through routes and through rates.

Respectfully submitted,

ONE CALL COMMUNICATIONS, INC.
d/b/a OPTICOM

By: ______________________

Randall B. Lowe
Charles H.N. Kallenbach
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, D.C. 20005
(202) 879-3939

Its Attorneys

January 6, 1992

CERTIFICATE OF SERVICE

I, Ruby M. Bullock, hereby certify that copies of the foregoing REPLY COMMENTS have been sent by United States first class mail, postage prepaid, on this 6th day of January, 1993 to the SERVICE LIST which is attached hereto.

Ruby M. Bullock

Ruby M. Bullock

SERVICE LIST

Cheryl A. Tritt, Chief
Common Carrier Bureau
Federal Communications
Commission
1919 M Street, N.W., Room
500
Washington, DC 20554

William Malone
Miller & Holbrooke
1225 - 19th Street, N.W.
Washington, DC 20036

Gregory J. Vogt, Chief
Tariff Division
Federal Communications
Commission
1919 M Street, N.W., Rm.
518
Washington, DC 20554

Downtown Copy Center
1919 M Street, N.W., Rm.
246
Washington, DC 20036

Colleen Boothby, Deputy
Chief
Tariff Division
Federal Communications
Commission
1919 M St., N.W., Room 518
Washington, DC 20554

Judy Nitsche, Chief
Tariff Review Branch
Federal Communications
Commission
1919 M St., N.W., Rm. 518
Washington, DC 20554

Policy & Program Planning
Division
Common Carrier Bureau
Federal Communications
Commission
1919 M St., N.W., Rm. 544
Washington, DC 20554

Albert H. Kramer
Robert F. Aldrich
Keck, Mahin & Cate
1201 New York Ave., N.W.
Penthouse Suite
Washington, DC 20005-3919

Floyd S. Keene
Michael S. Pabian
Ameritech Operating Cos.,
Rm. 4H76
2000 W. Ameritech Ctr. Dr.
Hoffman Estates, IL
60196-1025

Durward D. Dupre
Richard C. Hartgrove
Southwestern Bell
Telephone Co.
1010 Pine Street, Rm. 2114
St. Louis, MO 63101

Lawrence E. Sarjeant
Randall S. Coleman
US West Communications, Inc.
1020 19th St., N.W.
Suite 700
Washington, DC 20036

Patrick A. Lee
William J. Balcerski
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

Andrew D. Lipman
Jean L. Kiddoo
Swidler & Berlin, Chrtd.
3000 K St. N.W., Suite 300
Washington, DC 20007

Catherine R. Sloan
Vice Pres. Federal Affairs
LDDS Communications, Inc.
1825 I St., N.W., Ste. 400
Washington, DC 20006

Larry Moreland
SDN Users Assn., Inc.
c/o Caterpillar, Inc.
600 W. Washington St., AD3H
East Peoria, IL 61630

Douglas F. Brent
Advanced Telecommunications Corp.
10000 Shelbyville Road
Louisville, KY 40223

Douglas N. Owens
Northwest Pay Phone Assn.
4705 16th Avenue, N.E.
Seattle, WA 98105

Gregory Casey
Jane A. Fisher
International Telecharge, Inc.
6707 Democracy Blvd.
Bethesda, MD 20817

Brad Mutschelknaus
Wiley, Rein, Fielding
1776 K Street, N.W.
Washington, DC 20006

William B. Barfield
Richard M. Sbaratta
BellSouth Telecommunications, Inc.
1155 Peachtree St., N.E.
Suite 1800
Atlanta, GA 30367-6000

W. Audie Long
U.S. Long Distance, Inc.
9311 San Pedro, Suite 300
San Antonio, TX 78216

Alan W. Saltzman
Zero Plus Dialing, Inc.
9311 San Pedro, Suite 300
San Antonio, TX 78216

Steven E. Watkins
David Cosson
National Telephone
Cooperative Assn.
2626 Pennsylvania Ave.,
N.W.
Washington, DC 20037

John A. Ligon
CompTel Computer Corp.
128 Mount Hebron Avenue
Post Office Box 880
Upper Montclair, NJ 07043

Genevieve Morelli
CompTel Assn.
1140 Conn. Ave., N.W.
Washington, DC 20036

Richard E. Wiley
Danny E. Adams
Steven A. Augustino
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

Martin T. McCue
Linda Kent
United States Telephone
Assn.
900 - 19th Street, N.W.,
Suite 800
Washington, DC 20006-2105

Leon M. Kestenbaum
H. Richard Juhnke
Sprint Comm. Co., L.P.
1850 M St., N.W., 11th
Flr.
Washington, DC 20036

Rick L. Anthony
Quest Communications
Corporation
6600 College Boulevard,
Suite 205
Overland Park, KS 66211

Mary J. Sisak
Donald J. Elardo
MCI Telecommunications
Corp.
1801 Pennsylvania Ave.,
N.W.
Washington, DC 20006

James P. Tuthill
Nancy C. Woolf
Pacific Bell/Nevada Bell
140 New Montgomery St.,
Rm. 1523
San Francisco, CA 94105

James L. Wurtz
Pacific Bell/Nevada Bell
1275 Pennsylvania Ave.,
N.W.
Suite 1200
Washington, DC 20004

Randolph J. May
David A. Gross
Sutherland, Asbill &
Brennan
1275 Pennsylvania Avenue,
N.W.
Washington, DC 20004-2404

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W., Suite
1200
Washington, DC 20036

John M. Goodman
Bell Atlantic Telephone
Cos.
1710 H Street, N.W.
Washington, DC 20036

Ellyn Elise Crutcher
Consolidated Companies
121 S. 17th Street
Matoon, IL 61938

Joseph W. Miller
WilTel, Inc.
One Williams Center, Suite
3600
P.O. Box 2400
Tulsa, OK 74102

Judith St. Ledger-Roty
Michael R. Wack
Reed Smith Shaw & McClay
1200 - 18th Street, N.W.
Washington, DC 20036

Richard L. Goldberg
Martin A. Mattes
Graham & James
One Maritime Plaza, Suite
300
San Francisco, CA 98411

Amy S. Gross
NYCOM Information
Services, Inc.
2701 Summer Street, Suite
200
Stamford, CT 06905

David Cosson
L. Marie Guillory
National Telephone Coop. Assn.
2626 Pennsylvania Ave., N.W.
Washington, DC 20037

Margot Smiley Humphrey
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Washington, DC 20036

Perry O. Hooper, Jr.
House of Representatives
District No. 78 Montgomery County
Alabama State House
Montgomery, AL 36100

Taylor F. Harper
House of Representatives
District No. 108 Mobile County
Alabama State House
Montgomery, AL 36100

Patricia A. Weye
W.L. Gore & Associates, Inc.
1501 Barksdale Road
P.O. Box 6236
Newark, DE 19714-6336

Keith J. Roland
Roland, Fogel, Koblenz & Carr
One Columbia Place
Albany, NY 12207

Vernell Sturns, Exec. Director
Dallas/Fort Worth Int'l Airport
East Airfield Drive, P.O. Drawer DFW
Dallas/Fort Worth Airport, TX 75261

Robert N. Broadbent, Director
Clark County, Dept. of Aviation
McCarren International Airport
P.O. Box 11005
Las Vegas, NV 89111

Jerry L. McMichael
Executive Vice President, Finance/Administration
Memphis-Shelby Intl. Airport
P.O. Box 30168
Memphis, TN 38130-0168

John W. Priest, Chairman & CEO
Teltronics, Inc.
2150 Whitfield Industrial Way
Sarasota, FL 34243-4046

Krys T. Bart
Assistant Director
City of Fresno
2401 N. Ashley Way
Fresno, CA 93727

Debra L. Lagapa
Morrison & Foerster
2000 Pennsylvania Ave., N.W.
Suite 5500
Washington, DC 20006

G. A. Christenberry, Jr.
State of Georgia
Dept. of Admin. Services
Telecommunications Div.
200 Piedmont Ave.
Ste. 1402
Atlanta, GA 30334-5540

Veronica M. Ahern
Nixon, Hargrove, Devans & Doyle
One Thomas Circle, N.W., Suite 800
Washington, DC 20005

Rochelle D. Jones
Director, Regulatory
Southern New England Telephone Co.
227 Church Street, 4th Floor
New Haven, CT 06510

Paul C. Besozzi
Besozzi & Gavin
1901 L Street, N.W., Ste. 200
Washington, DC 20036

Josephine S. Trubek
Rochester Telephone Corp.
180 South Clinton Avenue
Rochester, NY 14646-0700

James D. Heflinger
Douglas W. Kinkoph
LiTel Communications, Inc.
4650 Lakehurst Court
Dublin, OH 43017

Pamela J. Brandon
Division Administrator
Wisconsin Dept. of Corrections
149 East Wilson Street
P.O. Box 7925
Madison, WI 53707

Stanley F. Bates
Assistant Director
Arizona Dept. of Corrections
1601 W. Jefferson Street
Phoenix, AZ 85007-3003

O. Lane McCotter
Executive Director
Utah Dept. of Corrections
6100 South 300 East
Murray, UT 84107

Perry R. Eichor, Secretary
S.C. Jail Administrators
Assn.
P.O. Box 10171
Greenville, SC 29603

Thomas P. Engel
Director of Airports
County of Sacramento
6900 Airport Boulevard
Sacramento, CA 95837

Richard G. Kiekbusch,
President
American Jail Association
100 Day Road, Suite 100
Hagerstown, MD 21740

Mark J. Angell, Vice
President
Universal Technology &
Communications
Corporation
10940 Laureate Drive, Ste.
8300
San Antonio, TX 78249-
3343

G.A. Barron, Jr.
President/General Manager
Portland 76 Auto/Truck
Plaza Inc.
21856 Bents Road, N.E.
I-5, Exit 278
Aurora, OR 97002

Gerald K. Olson
Cheyenne Airport
P.O. Box 2210, 200 E. 8th
Avenue
Cheyenne, WY 82003-2210

Louis E. Miller
Salt Lake City Airport
Authority
AMF Box 22084
Salt Lake City, UT 84122

C.M. Armour, President
Southwest Georgia Regional
Airport
3905 Newton Road
Albany, GA 31707

Eddie F. Storer
Natrona County
International Airport
8500 Fuller Street
Casper, WY 82604-1697

Patricia A. Simmons
Telecommunications Officer
Montana State University
Office of Systems and
  Computing Devices
Bozeman, MT 59717-0324

James B. Dransfield
Director,
Telecommunications
Duke University
Durham, NC 27706

Linda M. Zaina, Esq.
OPATSCO
2000 K Street, N.W., Ste.
205
Washington, DC 20006

Brian J. Kinsella
American Hotel & Motel
Association
1201 New York Ave., N.W.
Washington, DC 20005-3931

Darrell S. Townsley
Special Assistant,
Attorney General
Illinois Commerce
Commission
180 North LaSalle St.,
Ste. 810
Chicago, IL 60601

James R. Monk
Indiana Utility Regulatory
Commn.
302 W. Washington St.,
Ste. E306
Indianapolis, IN 46204

James B. Gainer, Section
Chief
Public Utilities Section
180 E. Broad Street
Columbus, OH 43266

Cheryl L. Parrino,
Chairman
Public Service Comn. of
Wisconsin
4802 Sheboygan Ave., P.O.
Box 7854
Madison, WI 53707

Stephan G. Kraskin
2120 L Street, N.W., Ste.
300
Washington, DC 20037

Benjamin J. Griffin
Reed, Smith, Shaw & McClay
1200 - 18th St., N.W.
Washington, DC 20036

Ronald G. Choura
Telecommunications Section
Policy Division
Michigan Public Service
Commission
P.O. Box 30221
Lansing, MI 48909-7721

Alan J. Thiemann
Taylor, Theimann & Aitken
908 King Street, Ste. 300
Alexandria, VA 22314

John F. Dodd
Smith, Gill, Fisher &
Butts
One Kansas City Place
1200 Main Street, 35th
Street
Kansas City, MO 64105-
2152

Ellen M. Averett
Assistant Counsel
Pennsylvania Public
Utilities Comn.
P.O. Box 3265, G-28
North Office Building
Harrisburg, PA 17105-3265

W. Dewey Clower
G. Timothy Leighton
National Association of
Truck
Stop Operators
1199 North Fairfax Street,
Ste. 801
Alexandria, VA 22314

Charles P. Miller
General Counsel
Value-Added
Communications, Inc.
1901 S. Meyers Road, Ste.
530
Oakbrook Terrace, IL
60181

Francine J. Berry
Mark C. Rosenblum
Robert J. McKee
AT&T
Room 3244J1
295 North Maple Avenue
Basking Ridge, NJ 07920

Eileen E. Huggard
Thomas J. Dunleavy
New York City Department
of
Telecommunications and
Energy
75 Park Place, Sixth Floor
New York, NY 10007